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October 26, 2011

Lakiesha Christopher
Department of Energy and Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, CT 06106-5127

**Re: Application Numbers 201105807-201105810
Permit Numbers 135-0143 to 135-0146
United States Surgical, Division of Tyco Healthcare Group LP**

Dear Lakiesha:

United States Surgical, Division of Tyco Healthcare Group LP (USS) appreciates the opportunity to provide comments on the Tentative Determination associated with the application numbers listed above. These comments are common to all four (4) draft permits included and are as follows:

1. In Part I. (Design Specifications) D. (Stack Parameters), the draft permit states that the "Minimum gas flowrate (acfm)" is 7,100. The exhaust fan for that stack is being designed to include a variable speed drive with a range of ~4,000 cfm to 7,000 cfm, depending upon the needs of the process. We recommend that the limit be revised to read "Minimum gas flowrate (acfm): **4,000**".
2. In Part III. (Monitoring, Record Keeping and Reports Requirements) A., there is a typographical error. Please replace the word "moth" with "month".
3. Part VI. (Stack Emission Test Requirements) E. requires the completion of emission testing for ethylene oxide every 5 years. This testing would be identical to the work practice emission testing option included under 40 CFR 63.363(b)(4) and referenced in Part III. D. of the draft permit. Although the intent of the work practice testing is to determine the overall control efficiency of the catalytic oxidizer, it is necessary to determine the ppm levels in the exhaust and calculate the lb/hr emission rate (the test is a one-hour test) to determine efficiency. As such, both emission tests would be identical and, in the event we chose to complete the emission test to satisfy the work practice requirement, there may be some confusion as to the correct testing frequency. We recommend that the

language in Part VI. E. be revised to read "**In the event emission testing is not conducted as a work practice in Part III. D.**, the Permittee shall conduct recurrent emission testing for ethylene oxide within 5 years from the date of the previous stack test to demonstrate compliance with the lb/hr and ppm limits, as well as the overall control efficiency."

If you have any questions or require any additional information please contact me directly at (203) 492-7188 or by email at bill.richardson@covidien.com.

Sincerely,



William Richardson
Environmental, Health and Safety Manager

.e, Steven

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Number of pieces: 1
Weight: 0.50 lb.
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